

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**DEFENDANTS' STATEMENT IN CONNECTION  
WITH THE PROPOSED SETTLEMENT**

Defendants<sup>1</sup> hereby submit this statement in connection with the proposed Settlement of this action solely to make clear that they neither adopt nor join in any factual or legal discussions in Plaintiffs' submissions in support of the Settlement. While Defendants have entered into the Settlement to resolve this litigation and therefore support its approval by the Court, Defendants deny wrongdoing or liability in all respects and reserve all rights to contest any facts or legal analyses set forth in Plaintiffs' submissions in the event that, for any reason, the Settlement is not approved and litigation of the claims herein resumes.

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<sup>1</sup> Bank of America Corporation and Bank of America, N.A.; Barclays Bank PLC; BNP Paribas; Citigroup Inc., Citibank, N.A., and Citigroup Global Markets Inc.; Credit Suisse AG; Deutsche Bank AG; Goldman, Sachs & Co.; HSBC Bank PLC and HSBC Bank USA, N.A.; JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A.; Morgan Stanley & Co. LLC; Royal Bank of Scotland PLC; Royal Bank of Scotland N.V.; UBS AG and UBS Securities LLC; International Swaps and Derivatives Association ("ISDA"); Markit Group Holdings Ltd. and Markit Group Ltd. ("Markit"); and any other Person or Persons who are named as defendants in the Action at any time up to and including the date a Preliminary Approval Order is entered.

Dated: October 16, 2015

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